

Richard B. Lind  
Attorney At Law  
575 Lexington Avenue – 4<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 888-7725 Email: rlind@lindlawyer.com

April 21, 2020

**VIA EMAIL/ REQUEST TO FILE UNDER SEA**

Hon. Mary Kay Vyskocil  
United States District Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/22/2020
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Re: United States v. Sarah Izhaki  
10 Cr. 161 (MKV)

Dear Judge Vyskocil:

I am the CJA attorney for Sarah Izhaki , a defendant in the above-referenced matter. This letter requests permission to expend CJA funds to hire an associate attorney, Jacob Mitchell, Esq., to assist me in preparing and writing a bail application if warranted, and to continue to assist me with any further duties in this case.

As can be seen in his attached resume, Mr. Mitchell graduated law school in 2010. Since that time, he has acquired extensive skills in document review, and in preparation for and assistance at federal criminal trials. From August 2010 to December 2014, he worked at DeNovo Legal as an Electronic Discovery Attorney. Additionally, Mr. Mitchell has been approved by District Judges to assist CJA attorneys in numerous criminal trials in this District, as well as one criminal trial in the Eastern District.

Specifically, Mr. Mitchell was appointed to assist CJA attorneys Kenneth Paul, in *United States v. McDow*, 15 Cr. 233 (PGG)(SDNY) and *United States v. Ryan Quashie*, 14 CR 376 (BMC)(EDNY); Allan Haber, in *United States v. Weisberg*, before Judge Analisa Torres; and Stephanie Carvlin, in *United States v. Marcel Harris*, before former Judge Forrest in this District in which Mr. Mitchell assisted in document review. All three attorneys have reported that they found Mr. Mitchell's work to be excellent.

Based on this background, I sought and obtained permission from Judge Vernon S. Broderick, for Mr. Mitchell to assist me as associate counsel in *United States v. Dean*

*Jones, et al.*, 15 Cr. 153 (VSB). Trial in that case was scheduled for April 17, 2017, but our client pleaded shortly before trial commenced. (A co-defendant proceeded to trial.) Mr. Mitchell's assistance -- particularly with respect to organization of discovery materials and "3500" materials -- was excellent. In addition, among other matters, Mr. Mitchell assisted me in *United States v. Branch*, 17 Cr. 64 (CS) before Judge Seibel, which resulted in a favorable plea.

I respectfully request this Court to assign and approve Mr. Mitchell to work on this case as my associate. Using Mr. Mitchell to do this work and assist me both in advance of and during any possible trial will be more cost-effective since Mr. Mitchell will bill at an hourly rate of \$90, whereas I will be billing at an hourly rate of \$152.

Thank you for the Court's consideration of this application.

Respectfully submitted,


/s/

Richard B. Lind

Enclosure

**Granted. SO ORDERED.**

Date: 4/22/2020  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge